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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited
liability company,

Plaintiff,

vs.

Civil No. 23-CV-79J

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA
CRYPTO INC., a Delaware corporation;
BIT ORIGIN, LTD., a Cayman Island
Company; SONICHASH LLC, a Delaware
limited liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY,
a Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES
1-18, related persons and companies who
control or direct some or all of the named
Defendants,

Defendants.

***DEFENDANT BITMAIN TECHNOLOGIES GEORGIA LIMITED'S
ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF BCB
CHEYENNE'S FIRST AMENDED COMPLAINT***

Defendant Bitmain Technologies Georgia Limited (“Bitmain Georgia”), by and through its undersigned attorneys, hereby answers and responds to Plaintiff BCB Cheyenne LLC’s (“Plaintiff”) First Amended Complaint, filed on September 30, 2023 (the “FAC”), as follows:

I. ANSWER TO INTRODUCTION

Bitmain Georgia avers and alleges that the unnumbered paragraphs in the Introduction of the FAC contain arguments, legal principles, and/or conclusions of law to which no answer is required.

To the extent a responsive pleading is required, with respect to the eighth unnumbered paragraph in the FAC Introduction, Bitmain Georgia denies that it is involved in the manufacturing of bitcoin mining hardware. Bitmain Georgia denies that it “began imposing its will.” Bitmain Georgia denies that it wanted to change the site plans for Campstool from an “air-cooled facility” to a “hydro facility.” Bitmain Georgia admits that it had discussions with MineOne Wyoming Data Center LLC regarding the possibility of building a new hydro facility. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in the eighth unnumbered paragraph.

With respect to the ninth unnumbered paragraph in the FAC Introduction, Bitmain Georgia admits that it entered into a Service Framework Agreement with MineOne Wyoming Data Center LLC. Bitmain Georgia denies that the Service Framework Agreement was executed on January 19, 2023. Bitmain Georgia alleges that the Service Framework Agreement speaks for itself. Bitmain Georgia admits that in February 2023, it shipped thousands of Bitcoin mining machines to the North Range facility located in Cheyenne, Wyoming. Bitmain Georgia lacks knowledge or

information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in the ninth unnumbered paragraph.

Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of the remaining unnumbered paragraphs in the FAC Introduction, and therefore denies, the allegations in the remaining unnumbered paragraphs.

II. ANSWER TO PARTIES, JURISDICTION AND VENUE

1. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 1.

2. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 2.

3. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 3.

4. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 4.

5. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 5.

6. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 6.

7. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 7.

8. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 8.

9. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 9.

10. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 10.

11. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 11.

12. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 12.

13. Bitmain Georgia admits that the Form of Service Order in the Service Framework Agreement lists a Mineone Partners LLC account name for billing and payment. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 13.

14. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 14.

15. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 15.

16. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 16.

17. Bitmain Georgia admits the allegations in Paragraph 17.

18. Bitmain Georgia admits the allegations in Paragraph 18.

19. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 19.

20. The allegations in Paragraph 20 state legal conclusions to which no responsive pleading is required.

21. The allegations in Paragraph 21 state legal conclusions to which no responsive pleading is required.

22. The allegations in Paragraph 22 state legal conclusions to which no responsive pleading is required.

23. The allegations in Paragraph 23 state legal conclusions to which no responsive pleading is required.

24. The allegations in Paragraph 24 state legal conclusions to which no responsive pleading is required.

25. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 25.

26. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 26.

III. ANSWER TO FACTS COMMON TO ALL CLAIMS

27. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 27.

28. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 28.

29. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 29.

30. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 30.

31. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 31.

32. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 32.

33. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 33.

34. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 34.

35. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 35.

36. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 36.

37. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 37.

38. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 38.

39. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 39.

40. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 40.

41. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 41.

42. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 42.

43. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 43.

44. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 44.

45. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 45.

46. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 46.

47. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 47.

48. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 48.

49. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 49.

50. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 50.

51. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 51.

52. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 52.

53. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 53.

54. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 54.

55. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 55.

56. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 56.

57. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 57.

58. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 58.

59. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 59.

60. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 60.

61. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 61.

62. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 62.

63. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 63.

64. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 64.

65. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 65.

66. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 66.

67. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 67.

68. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 68.

69. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 69.

70. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 70.

71. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 71.

72. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 72.

73. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 73.

74. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 74.

75. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 75.

76. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 76.

77. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 77.

78. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 78.

79. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 79.

80. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 80.

81. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 81.

82. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 82.

83. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 83.

84. Bitmain Georgia denies that it “had begun conspiring and negotiating a deal between themselves that involved taking over the site operations from Plaintiff.” Bitmain Georgia

admits that it received project approval documents, power purchase agreement(s), and land title documents from MineOne Wyoming Data Center LLC on December 6, 2022. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 84.

85. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 85.

86. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 86.

87. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 87.

88. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 88.

89. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 89.

90. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 90.

91. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 91.

92. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 92.

93. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 93.

94. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 94.

95. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 95.

96. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 96.

97. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 97.

98. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 98.

99. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 99.

100. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 100.

101. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 101.

102. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 102.

103. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 103.

104. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 104.

105. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 105.

106. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 106.

107. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 107.

108. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 108.

109. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 109.

110. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 110.

111. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 111.

112. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 112.

113. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 113.

114. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 114.

115. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 115.

116. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 116.

117. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 117.

118. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 118.

119. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 119.

120. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 120.

121. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 121.

122. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 122.

123. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 123.

124. Bitmain Georgia admits that it entered into a Service Framework Agreement with MineOne Wyoming Data Center LLC. Bitmain Georgia denies that the Service Framework Agreement was executed on January 19, 2023. Bitmain Georgia alleges that the Service Framework Agreement speaks for itself. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 124.

125. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 125.

126. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 126.

127. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 127.

128. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 128.

129. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 129.

130. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 130.

131. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 131.

132. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 132.

133. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 133.

134. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 134.

135. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 135.

136. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 136.

137. Bitmain Georgia admits that the Service Framework Agreement included a Form of Service Order for 9,800 S19XP Bitcoin mining computers with an estimated arrival date before February 25, 2023. Bitmain Georgia further admits that the Form of Service Order designated MineOne Wyoming Data Center LLC as the “Service Provider.” Bitmain Georgia alleges that the Service Framework Agreement and the Form of Service Order speak for themselves. Bitmain Georgia denies the remaining allegations in Paragraph 137.

138. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 138.

139. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 139.

140. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 140.

141. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 141.

142. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 142.

143. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 143.

144. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 144.

145. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 145.

146. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 146.

147. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 147.

148. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 148.

149. Bitmain Georgia denies that Bitmain Georgia engineers facilitated water testing or investigated or explored changing plans at Campstool. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 149.

150. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 150.

151. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 151.

152. Bitmain Georgia admits that a conference call was held on February 13, 2023. Bitmain Georgia denies that the meeting was about changing the site plans for Campstool.

153. Bitmain Georgia denies that it was “working to insert themselves as the site operators for North Range and Campstool.” Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 153.

154. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 154.

155. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 155.

156. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 156.

157. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 157.

158. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 158.

159. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 159.

160. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 160.

161. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 161.

162. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 162.

163. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 163.

164. Bitmain Georgia admits that 9,800 S19XP Bitcoin mining computers were delivered to a warehouse in Cheyenne, Wyoming. Bitmain Georgia admits that the Bitcoin mining

computers were transported from Texas to Cheyenne, Wyoming. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 164.

165. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 165.

166. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 166.

167. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 167.

168. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 168.

169. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 169.

170. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 170.

171. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 171.

172. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 172.

173. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 173.

174. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 174.

175. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 175.

176. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 176.

177. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 177.

178. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 178.

179. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 179.

180. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 180.

181. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 181.

182. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 182.

183. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 183.

184. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 184.

185. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 185.

186. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 186.

187. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 187.

188. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 188.

189. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 189.

190. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 190.

191. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 191.

192. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 192.

193. Bitmain Georgia denies the allegations in Paragraph 193.

ANSWER TO FIRST CLAIM FOR RELIEF

**BREACH OF CONTRACT AGAINST MINEONE WYOMING,
INCLUDING ANTICIPATORY REPUDIATION OF CONTRACT**

194. Bitmain Georgia incorporates by reference all prior paragraphs of this Answer.

195. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 195.

196. The allegations in Paragraph 196 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 196.

197. The allegations in Paragraph 197 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 197.

198. The allegations in Paragraph 198 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 198.

199. The allegations in Paragraph 199 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 199.

200. The allegations in Paragraph 200 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 200.

201. Bitmain Georgia denies the allegations in Paragraph 201.

ANSWER TO SECOND CLAIM FOR RELIEF

**BREACH OF THE IMPLIED COVENANT OF GOOD FAITH AND
FAIR DEALING AGAINST MINEONE WYOMING**

202. Bitmain Georgia incorporates by reference all prior paragraphs of this Answer.

203. The allegations in Paragraph 203 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 203.

204. The allegations in Paragraph 204 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 204.

205. The allegations in Paragraph 205 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 205.

206. The allegations in Paragraph 206 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 206.

207. Bitmain Georgia denies the allegations in Paragraph 207.

ANSWER TO THIRD CLAIM FOR RELIEF

BREACH OF CONTRACT AGAINST TERRA

208. Bitmain Georgia incorporates by reference all prior paragraphs of this Answer.

209. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 209.

210. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 210.

211. The allegations in Paragraph 211 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 211.

212. The allegations in Paragraph 212 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 212.

213. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 213.

214. The allegations in Paragraph 214 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 214.

215. Bitmain Georgia denies the allegations in Paragraph 215.

ANSWER TO FOURTH CLAIM FOR RELIEF

**BREACH OF THE IMPLIED COVENANT OF GOOD FAITH AND FAIR
DEALING AGAINST TERRA**

216. Bitmain Georgia incorporates by reference all prior paragraphs of this Answer.

217. The allegations in Paragraph 217 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 217.

218. The allegations in Paragraph 218 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 218.

219. The allegations in Paragraph 219 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 219.

220. The allegations in Paragraph 220 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia denies the allegations in Paragraph 220.

221. Bitmain Georgia denies the allegations in Paragraph 221.

ANSWER TO FIFTH CLAIM FOR RELIEF

**INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS
AGAINST DEFENDANTS BIT ORIGIN LTD., MINEONE PARTNERS LLC,
SONICHASH LLC, BITMAIN TECHNOLOGIES HOLDING COMPANY, AND
BITMAIN TECHNOLOGIES GEORGIA LIMITED**

222. Bitmain Georgia incorporates by reference all prior paragraphs of this Answer.

223. Bitmain Georgia admits that it did not have a contract with Plaintiff. Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the remaining allegations in Paragraph 223.

224. Bitmain Georgia denies the allegations in Paragraph 224.

225. Bitmain Georgia denies the allegations in Paragraph 225.

226. Bitmain Georgia denies the allegations in Paragraph 226.

ANSWER TO SIXTH CLAIM FOR RELIEF

**AGAINST DEFENDANTS MINEONE WYOMING DATA CENTER LLC,
TERRA CRYPTO INC., BIT ORIGIN LTD., MINEONE PARTNERS LLC, AND
SONICHASH LLC: ALTER EGO AND ENTERPRISE LIABILITY FOR THE
BREACHES AND TORTS OF MINEONE WYOMING, TERRA, BIT ORIGIN,
MINEONE PARTNERS AND SONICHASH**

227. Bitmain Georgia incorporates by reference all prior paragraphs of this Answer.

228. The allegations in Paragraph 228 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 228.

229. The allegations in Paragraph 229 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 229.

230. The allegations in Paragraph 230 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 230.

231. The allegations in Paragraph 231 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 231.

232. The allegations in Paragraph 232 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 232, including its footnote.

233. The allegations in Paragraph 233 state legal conclusions to which no responsive pleading is required, but to the extent a responsive pleading is required, Bitmain Georgia lacks

knowledge or information sufficient to form a belief about the truth of, and therefore denies, the allegations in Paragraph 233.

234. Bitmain Georgia denies the allegations in Paragraph 234.

ANSWER TO PRAYER FOR RELIEF

Bitmain Georgia denies that Plaintiff is entitled to any of the relief described in its Prayer for Relief, including subparagraphs (A)–(E).

AFFIRMATIVE DEFENSES

Bitmain Georgia asserts the following affirmative defenses in response to the FAC, subject to its right to amend and assert such other affirmative defenses as may become available during discovery in this action. In asserting these defenses, Bitmain Georgia does not claim or admit to have the burden of proof on any issue for which Plaintiff properly bears the burden or Bitmain Georgia does not otherwise bear the burden of proof or production.

FIRST AFFIRMATIVE DEFENSE
(Failure to State a Claim)

Plaintiff's FAC and each and every claim for relief alleged therein, fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE
(Justification)

Plaintiff's FAC and each and every claim for relief alleged therein, is barred in whole or in part because Bitmain Georgia's conduct was justified and/or fair competition.

THIRD AFFIRMATIVE DEFENSE
(No Causation and/or Superseding Cause)

Plaintiff's FAC, and each claim for relief alleged therein, is barred in whole or in part because Plaintiff suffered no damages as a result of the claims alleged or, if it did, those damages were not directly or proximately caused by Bitmain Georgia, and/or are attributable to independent and superseding causes, which causes and damages, if any, were not reasonably foreseeable by Bitmain Georgia.

FOURTH AFFIRMATIVE DEFENSE
(No Injury or Damages)

Plaintiff's FAC, and each and every claim for relief alleged therein, is barred in whole or in part because Plaintiff has not been injured or damaged as a proximate result of any act or omission of Bitmain Georgia.

FIFTH AFFIRMATIVE DEFENSE
(Speculative Damages)

Plaintiff is not entitled to any damages or any claim for relief because any damages are speculative, uncertain, vague, and not enforceable.

SIXTH AFFIRMATIVE DEFENSE
(Failure to Mitigate)

To the extent Plaintiff has sustained damages, which Bitmain Georgia expressly denies, Plaintiff has contributed in a direct and proximate manner to such damages by failing to act reasonably and prudently to mitigate those damages. Plaintiff's damages, if any, must be reduced by the extent to which those damages are proximately caused by Plaintiff's failure to mitigate such damages.

SEVENTH AFFIRMATIVE DEFENSE
(Adequate Remedy at Law)

To the extent Plaintiff seeks equitable relief, any claim by Plaintiff for such relief is barred because, to the extent Plaintiff is entitled to any remedy, which is not admitted hereby or herein, Plaintiff has an adequate remedy at law and/or other requirements for granting injunctive or other equitable relief cannot be satisfied.

EIGHTH AFFIRMATIVE DEFENSE
(Estoppel)

Plaintiff's FAC, and each and every claim for relief alleged therein, is barred in whole or in part because Plaintiff is estopped by its own conduct to claim any right to damages or other monetary relief from Bitmain Georgia.

NINTH AFFIRMATIVE DEFENSE
(Waiver)

Plaintiff's FAC, and each and every claim for relief alleged therein, is barred in whole or in part because such claims have been waived, discharged, released, and/or abandoned.

TENTH AFFIRMATIVE DEFENSE
(Laches)

Plaintiff's FAC and each and every claim for relief alleged therein, is barred in whole or in part by the doctrine of laches.

ELEVENTH AFFIRMATIVE DEFENSE
(Unclean Hands)

Plaintiff's FAC and each and every claim for relief alleged therein, is barred in whole or in part by Plaintiff's unclean hands and/or inequitable or wrongful conduct.

TWELFTH AFFIRMATIVE DEFENSE
(Lack of Jurisdiction)

Plaintiff's FAC and each and every claim for relief alleged therein, is barred in whole or in part by a lack of personal jurisdiction and/or subject matter jurisdiction.

THIRTEENTH AFFIRMATIVE DEFENSE
(Improper and Inconvenient Venue)

Bitmain Georgia alleges that this district is an inconvenient and/or improper venue as to each and every claim for relief alleged therein.

FOURTEENTH AFFIRMATIVE DEFENSE
(Acquiescence)

Plaintiff's FAC and each and every claim for relief alleged therein, is barred in whole or in part by the doctrine of acquiescence.

FIFTEENTH AFFIRMATIVE DEFENSE
(Ambiguous, Impertinent, and Scandalous Allegations)

Plaintiff's FAC fails to comply with the pleading requirements of R. Civ. P. 8(a), 10(b) and 12, in that many paragraphs are redundant, immaterial, impertinent, overbroad, vague, ambiguous, contain undefined terms, and contain scandalous terms.

SIXTEENTH AFFIRMATIVE DEFENSE
(Payment)

Plaintiff's claims are barred by the doctrine of payment.

SEVENTEENTH AFFIRMATIVE DEFENSE
(Setoff and Recoupment)

Plaintiff's claims are barred by the doctrines of setoff and recoupment.

EIGHTEENTH AFFIRMATIVE DEFENSE
(Material Breach of Contract by Plaintiff)

Plaintiff's claims are barred, in whole or in part, because Plaintiff materially breached the terms of the DHS Agreement and other contracts, thereby excusing performance.

NINETEENTH AFFIRMATIVE DEFENSE
(Frustration)

Plaintiff's claims are barred, in whole or in part, by the doctrine of frustration.

TWENTIETH AFFIRMATIVE DEFENSE
(Bad Faith)

Plaintiff's claims are barred, in whole or in part, because Plaintiff's conduct, actions, and inaction amount to and constitute bad faith.

TWENTY-FIRST AFFIRMATIVE DEFENSE
(Unjust Enrichment)

Plaintiff's claims are barred, in whole or in part, by the equitable doctrine of unjust enrichment as Plaintiff has already been paid for more work and services than it is entitled to. Accordingly, Plaintiff's recovery should be barred, or at the very least, diminished under this equitable doctrine.

TWENTY-SECOND AFFIRMATIVE DEFENSE
(Lack of Standing)

Plaintiff lacks standing to maintain this action as, upon information and belief, Plaintiff purports to be a Wyoming limited liability corporation, but is a shell organization and vehicle for its members (Michael Murphy, Emory Patterson IV, and Neil Phippen) to purportedly conduct business and operate as a business in the digital currency mining space. Plaintiff is the alter ego of one or more of its members, and Plaintiff does not have standing to maintain this action.

TWENTY-THIRD AFFIRMATIVE DEFENSE
(Additional Defenses)

Bitmain Georgia is informed and believes and on that basis alleges that there may be additional defenses available to it , which are not now fully known and of which Bitmain Georgia is not now aware. Bitmain Georgia reserves the right to raise additional defenses once such additional defenses have been ascertained.

PRAYER FOR RELIEF

WHEREFORE, Bitmain Georgia prays for judgment against Plaintiff as follows:

1. That Plaintiff's FAC, and each and every claim for relief alleged therein be dismissed with prejudice;
2. That Plaintiff take nothing by way of the FAC;
3. That the Court order and award such other and further relief as the Court may deem just and proper.

Dated: December 13, 2023

BITMAIN TECHNOLOGIES GEORGIA
LIMITED, Defendant

BY: s/Khale J. Lenhart

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CERTIFICATE OF SERVICE

I certify the foregoing ***Defendant Bitmain Technologies Georgia Limited's Answer and Affirmative Defenses to Plaintiff BCB Cheyenne's First Amended Complaint*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 13 December 2023, and that copies were served as follows:

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